

d/
Cont.

said front wall having a door frame opening integrally formed with the housing body;
said unitary housing body portions cast from reinforced concrete by pouring concrete
into a cavity defined by an inner mold and outer mold providing a seamless
structure with a door frame opening; [and]
said unitary housing body provided with a door which is fire-resistant and burglary-
proof[.]; and
said door frame opening the only opening defined in the unitary housing body.

Remarks

Applicants request entry of the amendment and reconsideration of the rejections. Applicants note that Claims 30-32 have been withdrawn from consideration.

Claims are Not Anticipated by Hsu.

Applicants urge that their claimed invention is not anticipated by Hsu, U.S. Patent No. 5,210,985 ("985"). The Hsu patent discloses a structure for providing refuge and life support during a fire. The structure is provided with a fairly elaborate piping, drainage and plumbing structure to provide water and air supply in the case of a fire emergency. In fact, there is a sprinkler structure for spraying water inside the room. The description of the structure itself is limited to "fire-proof material such as concrete and other fire-proof constructive materials." Col. 3, lines 25-26. The disclosure further provides details on engaging the door from inside the room rather than a vault door of the present invention that is operable from the outside of the vault.

The Hsu '985 reference does not disclose the elements of the present invention. Specifically, the claimed invention is for a "unitary housing body." The security feature of the modular vault does

not include the piping, drainage and other access points into the poured concrete structure. This type of access is inappropriate for the claimed invention, which is intended for a secure storage vault. The multiple access points would compromise the integrity of the vault. The Hsu '985 reference actually teaches away from the present invention by emphasizing the piping into the unit with multiple ports for entrance into the unit. Therefore, the Hsu '985 references does not disclose, subject to § 102(a), the unitary housing body with the door frame opening as the only defined opening. Claim 27 is not anticipated by Hsu '985, and Applicants request withdrawal of the rejection based on § 102(b).

Claims are Non-Obvious.

The claims are not obvious in light of Guardiani, U.S. Patent No. 4,485,598 ("598"). Just as the Hsu reference does not teach or disclose the unitary structure of the claimed vault, neither does the Guardiani '598 reference, although both disclose structures but with drastically different features from the Applicants' invention. Both Hsu and Guardiani are structures for habitation, and as such include the infrastructure to provide air supply or windows, light, water and the like. Neither Hsu nor Guardiani discloses a secure vault structure which is pre-cast in a monolithic fashion. The present invention is pre-fabricated and ready to install on site without any significant structural additions.

As previously described, the Guardiani patent discloses a pre-fabricated multi-room housing structure which is built on a particular type of foundation. The present invention is for a secure vault that would be incorporated into another structure. The unitary housing structure has a frame for a vault-type door. The Guardiani patent teaches the interconnection of building elements and the accessibility of the building elements with doors and windows. Although the materials used for the

walls of the Guardiani reference are used in the present invention, that is where the comparison ends.

Merely using the same building materials does not render the present invention obvious.

Applicants urge that Figure 6 of the Guardiani reference does not indicate the use of a unitary mold for the production of the modular vault of the present invention. The Guardiani reference discloses rooms of the buildings that are made of multiple units of floors, walls and ceiling members that fit together to form the rooms of the structure.

Applicants respectfully request withdrawal of the obviousness rejection based on Guardiani.

Dependent Claims.

Claims 28 and 29 are dependent on Claim 27 and are patentable since the features of these claims incorporate the patentable features of Claim 27.

Applicants request allowance of all pending claims. If a telephone conference would further the progress of the examination, please call the undersigned.

No fees are believed due as a result of this response. The Commissioner is hereby authorized to charge any additional fees which may be required, or credit any overpayment, to Deposit Account No. 10-0447 (41241-00006USD1).

Respectfully submitted,

Sept. 14, 2000

Margaret A. Boulware
Margaret A. Boulware
Registration No. 28,708

Jenkens & Gilchrist,
A Professional Corporation
1100 Louisiana, Suite 1800
Houston, Texas 77002
Telephone: (713) 951-3300
Facsimile: (713) 951-3314